

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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VERA GORFINKEL,

Plaintiff,

v.

Case No.: CV 13-3093 (JFB) (AKT)

RALF VAYNTRUB, INVAR CONSULTING LTD.,
GENOMETRICA LTD., and GENOMETRICA
RESEARCH INC.

Defendants.
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EVELYN BEREZIN declares the following to be true, accurate and complete under the penalty of perjury:

1. Ms. Berezin is a Member of the Board of Directors of the Stony Brook Foundation and has personal knowledge of events related to the litigation between Professor Vera Gorfinkel ("Vera") and the defendants named above.
2. The deponent recalls that towards the end of August or the beginning of September 2011, deponent, by chance, met Prof. Serge Luryi ("Serge"), Chair of the Electrical Engineering Department at Stony Brook University and also Director of the Center for Advanced Technologies (Sensor CAT). Serge informed deponent that he had met with Ralf Vayntrub ("Ralf") at Stony Brook University. Ralf was the sole principal of Genometrica Ltd and Invar Consulting Ltd, which latter corporation had been financing research at Vera Gorfinkel's laboratory at SUNY (RF).
3. Serge repeated to deponent what Ralf had said about Vera at their recent meeting, telling deponent how terribly Vera had behaved in her work on the Genometrica - BioPhotonics research project. Ralf, in talking to Serge, characterized Vera as underhanded, not to be trusted, deceitful and called Vera a thief.
4. Serge also told deponent that Ralf had recently spent some time in his Department as well as in other parts of Stony Brook University, and that Ralph had

spoken in the same terms to many people, making accusations about Vera.

5. Deponent asked Serge whether he had spoken to Vera about this so he could hear her side of this issue. Serge said "No", he had not because he did not want to speak to Vera again.

6. At a later date, Vera told deponent of her own meeting with Serge and that, at this meeting, Serge told her that Ralf had said that she was not to be trusted and deceitful and that that Ralf had called her a thief. Deponent did not tell Vera until much later that she had heard these same general remarks from Serge.

I certify the above declaration is true, accurate and complete under the penalty of perjury.

Dated:

Stony Brook, New York

August 16, 2013


EVELYN BEREZIN